

EXHIBIT D

Gonzalez, Ramon

Volume 1 - 02/18/2020

Summary Proceeding with Highlighted Clips

Printed 05/23/2021 01:55PM CDT

CONFIDENTIAL

Plaintiffs Designation (Runtime - 00h:13m:22s)

Page 00006

05: First of all, could you state your full
06: name for the record?
07: A Ramon Gonzalez.

Page 00009

21: Q Mr. Gonzalez, who is your employer?
22: A Chart Industries.
23: Q And how long have you been employed by
24: Chart Industries?
25: A Since 2008 of February. Wow.

(continued page 00010)

0010

01: Q And what is your current position?
02: A Product specialist.
03: Q How long have you been a product
04: specialist?
05: A Since 2014.
06: Q What were you before you were a product
07: specialist?
08: A Technician.
09: Q And how long were you a technician?
10: A Since 2008 to 2014.

Page 00012

10: Q So as a technician, you would issue part
11: numbers and you would do some troubleshooting.
12: Is there anything else you did as a
13: technician?
14: A Provided trainings.
15: Q To who?
16: A To technicians.
17: Q To other Chart technicians?

18: A To other Chart technicians, yes.

19: Q Okay. Anyone else?

20: A And to distributor technicians.

21: Q Anyone else?

22: A No.

23: Q What would you train other Chart techs on?

24: A On the product.

25: Q Anything more specific?

(continued page 00013)

0013

01: A Just basically the product.

02: Q Which product?

03: A The freezers and aluminum tanks.

04: Q What do you mean by "freezers"?

05: A The stainless steel freezers.

06: Q Is that stainless steel cryogenic tanks?

07: A Yes.

08: Q So you would do trainings on stainless

09: steel freezers and aluminum tanks?

10: A Yes.

11: Q And what sort of trainings would you do

12: for the distributor technicians?

13: A The same.

Page 00013

17: Q So when you would do a training on a

18: stainless steel freezer, what sort of topics would

19: you cover?

20: A The controller and the freezer itself.

Page 00016

10: Q And what do you do as a product

11: specialist?

12: A Train distributors on how to use the
13: stainless steel products and aluminum tanks.
14: Q Is that training any different from what
15: we discussed earlier?
16: A It's more of a sales training.

Page 00025

12: Q Mr. Gonzalez, are you familiar with an
13: issue with the TEC 3000 controller where the serial
14: number would display as zero, liquid levels would
15: read as zero, and temperature readings would be
16: inaccurate?
17: A Yes.

Page 00025

24: Q What do you know about that issue?
25: A Just that the serial number equaled zero.

(continued page 00026)

0026

01: Q Did you know anything about the liquid
02: levels also reading as zero?
03: A That was also reported, yes.
04: Q That was reported in conjunction with the
05: serial number displaying as zero?
06: A It can be, but it's also reported at other
07: times where it's a user error.
08: Q And in the instances where the serial
09: number was displayed as zero, were there also
10: instances where temperature readings were reported
11: to be inaccurate?
12: A Yes.

Page 00027

08: (Exhibit Number 245 was marked for

09: identification.)

10: BY MS. ZEMAN:

11: Q I've handed you a document marked as

12: Exhibit 245. It's Bates stamped CHART002854 through

13: 2855.

14: And do you recognize this as an e-mail

15: chain that included your -- you as a Chart employee?

16: A Yeah, I see I was copied on it.

17: Q And in the first e-mail at the top of the

18: first page, it refers to: Customers report the

19: freezers spontaneously read zero of liquid and temps

20: way off. And then it refers to: The event log and

21: SN recorded in the software are erased.

22: Does that match the -- your understanding

23: of the issue we were just discussing?

24: MR. SMITH: Vague.

25: A It appears to be.

Page 00033

22: Q Is there a touchscreen version of the TEC

23: 3000 controller?

24: A I like the way they say that.

25: The touchscreen you could say is a version

(continued page 00034)

0034

01: of the TEC 3000, but it's a totally different

02: controller.

03: Q When did it go onto the market?

04: A 2017.

05: Q Roughly when in 2017?

06: A May. Around May of 2017.

07: Q Has Chart received any complaints about

08: the serial number displaying as zero with the
09: touchscreen controller?
10: MR. SMITH: Vague, calls for speculation.
11: A You have to check quality to see if there
12: are any reports on that, but to my knowledge, no.
13: BY MS. ZEMAN:
14: Q You're not aware of any such complaints?
15: A Right. Correct. Yes.

Page 00093

14: Q I've handed you a document marked as
15: Exhibit 255. It has Bates stamps CHART008310
16: through 8320.
17: And, again, this appears to be an e-mail
18: chain within Chart that includes you on at least
19: some of the e-mails; is that correct?
20: For instance, you are on the cc line on
21: the e-mail at the top of the first page.
22: A Okay.
23: Q Is that correct, what I described about
24: this e-mail chain?
25: A That I'm on it, yes.

(continued page 00094)

0094

01: Q And is this an e-mail chain you would have
02: either sent or received within the normal course of
03: business at Chart?
04: A Yes.
05: Q And is this chain generally talking about
06: a Chart tank that suffered an implosion of the inner
07: vessel?
08: A Yes, it appears so. Don't think I really

Page 00095

06: Q And going to the first page of the
07: exhibit, the second e-mail down is an e-mail from
08: yourself on March 14th of 2016, correct?
09: A Yes.
10: Q And in the third paragraph of that e-mail,
11: you describe what you suspect happened with the
12: tank, correct?
13: A Based on the evaluation from engineering,
14: yes.
15: Q And so when you say "we suspect" there,
16: are you referring to Chart generally?
17: A Yes.

Page 00098

19: Q But what you're describing there is
20: essentially that either a liquid or a gas got into
21: the vacuum space, expanded, and then that caused the
22: inner vessel to deform; is that accurate?
23: A That sounds right.
24: Q Did any frost form on this tank?
25: A Not that I recall.

Page 00099

08: Q And this document is regarding an MVE 1839
09: tank, correct?
10: A Yes.
11: Q Is that tank similar to the MVE 808?
12: MR. SMITH: Vague.
13: A No. I'll defer to engineering on that;
14: but physically speaking, no, it's different.
15: BY MS. ZEMAN:
16: Q How are they different?

17: A It's a larger vessel.
18: Q Any other differences?
19: A Yes, large lid.
20: Q So it's a larger vessel with a larger lid?
21: A Yes.
22: Q Anything else?
23: A Other than it being large.
24: Q And this tank had approximately 10 inches
25: of liquid nitrogen in it at the time that it -- that

(continued page 00100)

0100

01: it suffered the deformation, correct, according to
02: information included in the e-mail chain?
03: MR. SMITH: Foundation.
04: The e-mail actually says 10 feet of liquid
05: in it.
06: THE WITNESS: Where does it show that?
07: MR. SMITH: I was looking at the page
08: ending 8319.
09: THE WITNESS: 319.
10: A Well, that's a no-no right there. So the
11: freezer was transferred from one building to another
12: with liquid.
13: BY MS. ZEMAN:
14: Q And they shouldn't have transported it
15: with the liquid nitrogen --
16: A That's correct.
17: Q -- present, right?
18: A That is correct.
19: Q But according to the information in the
20: e-mail, they did so, correct?

21: A That's what it looks like, yeah.

Page 00102

19: Q And are you familiar with any instances

20: where a distributor reported a problem that was

21: found to be associated with the gettering system?

22: MR. SMITH: No foundation.

23: A Not that I can recall.

24: BY MS. ZEMAN:

25: Q You don't recall any discussion of getter

(continued page 00103)

0103

01: problems or -- of getter problems resulting in any

02: tank issues?

03: A Not that I recall.

04: Q Have you ever approved a tank replacement

05: because of a problem associated with a gettering

06: system?

07: A No, not that I'm aware of.

08: Q Have you ever approved a tank replacement

09: where molecular sieve was discussed as part of the

10: problem?

11: A What -- what?

12: Q Have you ever approved a tank replacement

13: where molecular sieve was discussed as part of the

14: problem?

15: A That's an engineering term. I defer to

16: engineering on that.

17: Q You're not familiar with the term being

18: raised in the course of approving any tank

19: replacements?

20: A I know it absorbs moisture.

21: Q Okay.

22: A That's it.

23: Q So just one more time. So you're not

24: familiar with that term being raised in the course

25: of approving any tank replacements?

(continued page 00104)

0104

01: A Not that I can recall.